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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: AT&T Petition for Extension of Implementation Deadline, *Call Authentication Trust Anchor*, WC Docket No. 17-97

Dear Ms. Dortch:

On February 9, 2021, Sekar Ganesan, Andrew Jurczak, Amanda Potter, and the undersigned, all of AT&T Services, Inc. (“AT&T”), met with Matt Collins, Alex Hobbs, Daniel Kahn, and Mason Shefa from the Wireline Competition and Ken Carlberg from the Public Safety and Homeland Security Bureaus to discuss AT&T’s request for a one-year extension of the June 30, 2021 deadline to implement the STIR/SHAKEN protocols on the Internet protocol (“IP”) portions of its network.¹ We explained that the impacted traffic volumes on AT&T’s Voice over Long-Term Evolution (“VoLTE”) network are very small.² We also discussed AT&T’s efforts to significantly reduce the impacted traffic volumes on or before June 30, 2021,³ work that remains on track.

In addition, we detailed events necessitating the Extension Request, including, among others, redistributed traffic volumes stemming from the COVID-19 pandemic. We explained that, while it is possible traffic flows on AT&T’s Domestic SIP Interconnect (“DSIPIC”) and Voice over IP Connect Service (“AVOICS”) platforms could return to pre-pandemic volumes and patterns, AT&T has yet to see such a shift on its network. Moreover, the DSIPIC and AVOICS platforms rely on legacy network components that cannot support STIR/SHAKEN, including more than 200 session border controllers (“SBCs”) and approximately 100 mobile switching centers (“MSCs”), all of which are approaching end-of-life. AT&T thus intends to build new STIR/SHAKEN-enabled routes and capacity in its network and transition traffic to that new infrastructure. While this work already is underway, it cannot feasibly be completed by June 30, 2021. Among other issues, completing the necessary traffic migrations is dependent on

¹ Petition for Extension of Implementation Deadline, WC Docket No. 17-97 (filed Nov. 20, 2020) (“Extension Request”).

² See *id.* at 3-4 (explaining that the impacted traffic volumes on the DSIPIC platform represent less than .28 percent of AT&T’s VoLTE traffic, while the impacted AVOICS traffic is approximately four percent).

³ See *id.* at 4 (stating that AT&T expects to reduce the impacted traffic volumes by approximately 70 percent on the DSIPIC platform and by as much as 50 percent on the AVOICS platform on or before the June 30, 2021 deadline).

third parties and vendor development and delivery schedules. Finally, to the extent the Commission issues a declaratory ruling narrowing the scope of STIR/SHAKEN implementation requirements based on the limitations of legacy IP platforms and the availability of replacement offerings that are STIR/SHAKEN-enabled, AT&T discussed the need to ensure that such relief applies to similarly situated providers and platforms.⁴

Please contact me should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, reading "Linda S. Vandeloop". The signature is written in a cursive, flowing style.

Linda S. Vandeloop

cc: Ken Carlberg
Matt Collins
Alex Hobbs
Daniel Kahn
Mason Shefa

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See Petition of Verizon for Declaratory Ruling or, in the Alternative, a Limited Extension of the STIR/SHAKEN Implementation Deadline, WC Docket No. 17-97, at 7-9 (filed Nov. 20, 2020) (detailing costs and challenges associated with upgrading 26 end-of-life switches, as well as the availability of alternative STIR/SHAKEN-enabled platforms, circumstances that are analogous to those detailed in AT&T's Extension Request); Letter from Christopher Oatway, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 17-97 (filed Feb. 9, 2021).